

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

Case No. 1:18-cv-00668
Hon. Hala Jarbou

v.

GEORGINA'S LLC, and
ANTHONY'S LITTLE G'S, LLC.

Defendants.

KENNETH L. BIRD
OMAR WEAVER (P58861)
MILES UHLAR (P65008)
Attorney for Plaintiff
477 Michigan Ave., Rm. 865
Detroit, Michigan 48226
(313) 226-4620
Miles.uhlar@eeoc.gov

Matthew Vermetten (P643425)
Attorney for Georgina's
600 E. Front Street, Ste. 102
Traverse City, Michigan 49686
(231) 929-3540
mvermetten@mich-legal.com

John Di Giacomo (P73056)
Attorney for Little G's
Revision Legal
444 Cass St., Suite D
Traverse City, MI 49684
(231) 714-0100
john@revisionlegal.com

**PROPOSED CONSENT JUDGEMENT AND PERMANENT
INJUNCTION AGAINST GEORGINA'S LLC AND ANTHONY'S**

LITTLE G'S, LLC

Money Judgement

Judgement is entered jointly and severally against Defendant Georgina's LLC and its successor entity, Defendant Anthony's Little G's, LLC (dba "Bushi", "Underground Sushi", "The Underground Sushi Factory" and/ or "Little G's") in favor of the Equal Employment Opportunity Commission in the total amount of Two Hundred Thousand Dollars (\$200,000.00) for the intentional, malicious and unlawful employment practices specified in Plaintiff's Amended Complaint (ECF No. 64), which violated Section 703(a)(1) and Section 704 of Title VII, 42 U.S.C. §§2000e-2(a)(1); 2000e-3(a). This judgement is broken down as follows:

- a) Defendants Georgina's LLC and Anthony's Little G's, LLC are jointly and severally liable to Plaintiff in the amount of Three Thousand Five Hundred Dollars (\$3,500.00) in backpay for the intentional, willful, malicious and retaliatory termination of Jessica Werthen.
- b) Defendants Georgina's LLC and Anthony's Little G's, LLC are jointly and severally liable to Plaintiff in the amount of Ninety-

Six Thousand Five Hundred Dollars (\$96,500.00) in non-pecuniary compensatory damages for the intentional, willful and malicious sexual harassment of Jessica Werthen and similarly situated female employees.

- c) Defendants Georgina's LLC and Anthony's Little G's, LLC, are jointly and severally liable to Plaintiff in the amount of One Hundred Thousand Dollars (\$100,000.00) in punitive damages for the intentional, willful and malicious sexual harassment of Jessica Werthen and similarly situated female employees.

Interest shall accrue on this judgement from the date of entry at the statutory rate. This judgement is a debt owed to the United States for an intentional tort.

Permanent Injunction and Order

Defendants Georgina's LLC and Anthony's Little G's, LLC, and their officers, successors, assigns, and all persons in active concert or participation with them are permanently enjoined from maintaining a sexually hostile work environment and/or retaliating against employees based on their opposition to any employment practice made unlawful under Title VII.

Defendant Anthony's Little G's, LLC is ordered to provide a minimum of two hours of interactive training to its owner and all of their employees within sixty days of the date of entry of this judgement. The training will, at a minimum, cover Title VII's prohibition of sexual harassment and retaliation. No later than fourteen days before the training, the Defendants shall provide the EEOC with the training materials to be used along with an outline of the training. The EEOC may provide reasonable input into the training. Defendants shall record the audio and video of the training and will provide a copy of the video- and audio-recording to the EEOC no later than five business days after the training. The training must show that Anthony's Little G's owner attended and participated in the training.

Nothing herein shall be binding on any persons other than the specific parties to this judgment. Nothing herein shall preclude Plaintiff from seeking any and all post-judgement remedies authorized by the facts and law.

SO ORDERED.

United States District Judge

Dated: _____

Agreed as to form and content:

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

/s/ Miles L. Uhlar
MILES L. UHLAR (P65008)
DETROIT FIELD OFFICE
Patrick V. McNamara Federal Building
477 Michigan Ave, Room 865
Detroit, Michigan 48226
(313) 226-4620
miles.uhlar@eeoc.gov
Date: February 1, 2021

GEORGINA'S, LLC.

/s/Anthony Craig
By: Anthony Craig
Its: Member/Manager
Dated: January 29, 2021

/s/ Matthew Vermetten
Matthew Vermetten (P643425)
600 E. Front Street, Ste. 102
Traverse City, MI 49686
(231) 929-3540
mvermetten@mich-legal.com
Attorney for Defendant Georgina's
Date: January 29, 2021

ANTHONY'S LITTLE G'S, LLC

/s/Anthony Craig
By: Anthony Craig
Its: Member/Manager
Dated: January 29, 2021

/s/ John Di Giacomo
John Di Giacomo
Attorney for Defendant Little G's
Revision Legal
444 Cass St., Suite D
Traverse City, MI 49684
(231) 714-0100
john@revisionlegal.com
Date: January 29, 2021